

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ORANGEBURG DIVISION**

Edwin Thibodeau, as Personal)	Case No.: 6:23-cv-06605-SAL-KFM
Representative of the Estate of Alan R.)	
Thibodeau,)	
)	
Plaintiff,)	
)	CONSENT MOTION FOR LEAVE TO
v.)	FILE AMENDED COMPLAINT
)	ADDING PARTIES AND TO
Bamberg County, South Carolina and Geri)	CONSOLIDATE
Gillespie, LPN, in her individual capacity,)	
)	
Defendants.)	
)	
)	

EDWIN THIBODEAU, as Personal)	
Representative of the Estate of Alan R.)	Case No.: 6:24-cv-00252-SAL-KFM
Thibodeau,)	
)	
Plaintiff,)	
)	
v.)	
)	
SOUTHERN HEALTH PARTNERS,)	
INC.,)	
)	
Defendants.)	
)	

NOW COMES the Plaintiff, with the express consent of all Defendants, and hereby moves this Honorable Court for an Order, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure for leave to file an Amended Complaint adding parties, and pursuant to Rule 42(a) consolidating the discovery and trial of the above captioned actions on the grounds that they appear to involve common questions of law and fact, and consolidation is in the interest of promoting efficiency and avoiding unnecessary costs and delay.

Subject to the forgoing, the Plaintiff, with the consent to of the Defendants, hereby moves for leave to file an Amended Complaint in Case No.: 6:23-cv-06605-SAL-KFM which is attached hereto as Exhibit 1. The proposed Amended Complaint adds new parties and consolidates Case No.: 6:23-cv-06605-SAL-KFM and Case No.: 6:24-cv-00252-SAL-KFM into Case No.: 6:23-cv-06605-SAL-KFM with the case caption of: Edwin Thibodeau, as Personal Representative of the Estate of Alan R. Thibodeau v. Bamberg County, South Carolina; Southern Health Partners, Inc.; Geri Gillespie, LPN, in her individual capacity; Karen Hughes, LPN, in her individual capacity; Officer Billy Ray Coggins, in his individual capacity; Lt. Ashley Woods, in her individual capacity; Cpl. Patrice Hatton, in her individual capacity; and Cpt. Latarcha Wilson, in her individual capacity.

WE SO MOVE:

EVANS MOORE, LLC

s/ James B. Moore III

James B. Moore III, Fed ID # 10844
Scott C. Evans, Fed ID # 10874
George W. Bryan, III, Fed ID # 104088
121 Screven Street
Georgetown, SC 29440
(843) 995-5000
(843) 527-4128 Facsimile
ATTORNEYS FOR PLAINTIFF

Georgetown, South Carolina
February 28, 2024

[Consent Signatures on Following Page]

WE CONSENT:

s/ James B. Moore III

James G. Long, III, Fed ID No. 5877

Amelia S. Waring, Fed ID No. 78232

MAYNARD NEXSEN PC

1230 Main Street, Suite 700 (29201)

Post Office Box 2426

Columbia, South Carolina 29202

Tel: 803.771.8900

Email: JLong@maynardnexsen.com

Email: AWaring@maynardnexsen.com

*Attorneys for Defendant Southern Health Partners,
Inc.; and Geri Gillespie, LPN, in her individual capacity*

CHANDLER & DUDGEON LLC

s/ J.W. Nelson Chandler

J.W. Nelson Chandler, Fed ID #7593

Email: nelson@chandlerdudgeon.com

J. Matthew Johnson, Fed ID #11391

Email: matt@chandlerdudgeon.com

P.O. Box 547

Charleston, SC 29402

Phone: (843) 577-5410

Fax: (843) 577-5650

*Attorneys for Defendant Bamberg County, South
Carolina*